

APPENDIX EXHIBIT A

Case # 02-22

TO: Diane Winters
From: Shane Hopkins # 253918
D.C.C.
1181 Paddock Rd.
Smyrna De. 19977

Date
10-10-02

Mrs Winters

Inclosed you will find all of the information you requested from me concerning my treatment at the hands of the Officials at D.C.C.

This includes a drawn up Civil Action Law Suit that was never filed by me because of my ignorance in how to file properly. This packet also includes a drawn up law suit from Melvin Posey who also believes he was mistreated at the hands of prison officials. Mr. Posey is currently trying to persue his Complaint in Court. Thier are also Copies of Grievances Filed by me soon after the incidents and the Grievance Boards responses. Thier are 2 additional Statements given to me by inmates who where also mistreated. These Statements where taken over 1 year ago and the only reason I still have them is because I appear to be a paperwork packrat. One Statement from Lawrance rambles on about many Subjects that you are not concerned with. However he tells of how he got Pneumonia From being placed in an air conditioned Cell without any cloathing, blanket, mattress or anything at all for a prolonged period of time.

→ over

PG # 2

And that he had to be given a penicillin shot from medical.

Another statement is from Louis Dickerson. Please forgive him, he is not exactly the Sharpest Crayon in the box and is obviously borderline retarded. But that is exactly why these Correctional Officers get away with treating him the way they do. The incident he speaks about was witnessed by roughly 50 inmates. Louis was hogtied and his whole head was Duck Taped over his mouth and around his head. And the result of the Duck Tape being removed from around his head was disgusting, large patches of hair was ripped from his head quite possibly scarring him for life. I could go on and on about the messed up things done to him.

My Complaint is simple. I was assaulted by a Correctional officer while handcuffed and my legs shackled. A nurse and 2 Doctors watched this incident and then refused to provide medical attention to me even though I asked repeatedly. They refused at the request of Lt. Fetzner who did this in order to cover up the incident. I requested that pictures be taken of myself and the room that I was beaten in. If I had been in a fight with another inmate pictures would have been taken of both of us but no pictures were taken because a Correctional Officer was involved.

→ over

And do you know what's crazy? I can live with being beaten while defenseless. Even though it was wrong I have gotten over it. But I can't get over being placed in an air conditioned, Freezing Cold, Concrete room. Completely Naked, not even underwear.

Over 1 year later and I can still remember Crouching in the Cell Corner Naked and Shivering uncontrollably for 15 days a Correction Officers male and female looked in on my Naked Shivering self and laughed at me. The Airconditioning was turned up full blast, Cold was part of the punishment and it drove me quite literally Crazy. No mattress or blanket of course. Nothing but a Stainless Steel Toilette and the Cold Concrete Floor from 5:00 AM to 10:00 PM. Then I was given a mattress and a paper sheet that was nothing more than a large paper ^{towel} ~~garment~~.

Needless to say I got out of that room after 15 days. But I ended up in trouble again after prison officials confiscated all of my legal work that was being done concerning the way I was treated. I complained long and loud and they took me back to one of those "Strip Cells" and when I refused to give them my clothing I was held against the cell wall while Security Chief Cunningham cut my clothes off of my body with a pocket knife.

→ over

PG # 4

I think I ~~to~~ lasted about 3 hours in that Cold room Completely naked befor I went Crazy and bit my hands, ~~and wrists~~ and wrists untill blood pured from my body. Thats right even the most Sanest man can be driven to extreams if put under insane Conditions. But at the time I Felt that the pain and Consiquences would be only momentary while the Suffering of that Cold Cell would last. Luckily a guard came to Check on me and I was given medical treatment and placed in a heated room in the infirmary. Pictures where taken of me in this Condition and I can think of at least 20 others who where placed in these Strip Cells.

Everything I've told you is true and plenty of others have been in the Same Situation. No one was allowed to use the phone to inform Family members of the way they where being treated. No letters where written to family because no one could write, No pen.

Plenty of inmates have plenty of petty gripes about the institutions in wich they are serving time. This is not a petty gripe. This is an obvious and Flagrant violation of my rights weather I'm a prisoner or not and it definitely is ~~sooooo~~ Cruel Punishment ment to demean and humiliate.

PG # 5

You've asked for any information I could provide and I've given what I can think of at the moment. My question to you is do you think being placed in a Cold Cell naked is right? And if not is it your intention to help put a stop to this form of punishment.

I don't know much about the law and my family was at a loss as to what to do about it. So time has passed and they say wounds heal with time. But when I think about it the humiliation back along with the anger.

Please let me know once you have received this letter. And if you need anything else just ~~not~~ ask.

P.S. I'm sorry it took so long to get this packet to you. I have been temporarily transferred to Delaware County Prison in P.A. I will be back in Smyrna soon. IF you need to send me anything in the meantime sent it to my mother at:

Carol Hopkins
355 Zynn Rd
Downingtown P.A
19335

APPENDIX EXHIBIT B

aclu delaware

Mr. Shane Hopkins
SBI# 00253918
Delaware Correctional Center
P.O. Box 500
Smyrna, DE 19977

Dear Mr. Hopkins,

We very much appreciate your sending us the information you did regarding your treatment at D.C.C. We also appreciate the information you provided from Mr. Collingwood and Mr. Dickerson. We will see to it that all the information is included in our investigation.

At the present time while working with prison officials we are also encouraging an interested reporter to investigate the conditions in Delaware prisons. Unfortunately your recent letter to us did not provide us permission to release your name and SBI number to the reporter in hopes you would be contacted to provide information. If this was an oversight on your part simply provide us written authorization otherwise we will not release your name to the reporter or anyone else. Even if you choose not to have your name given to the reporter we appreciate the information you provided and will make use of it in our ongoing attempt to improve conditions within the prison system.

Again, we thank you for assisting us in our efforts to improve the conditions at D.C.C. Thank you for considering our request and we look forward to receiving your permission.

Sincerely,

Diane Winters
Intake Representative

APPENDIX EXHIBIT C

July 2, 2005

Rec'd
7/4/05
JCU

Dir ACLU of Del.

DREWRY NASH FENNEL Esq.

RE: ATTACHED.

I would like to address the reason why these materials/letters have taken so long to get to you. It's very simple BRIAN ENGREM LAW LIBRARIAN D.C.C S.H.U. TRIES TO STOP, PREVENT, HAMPER AND DELAY Filings By Withholding of Legal Filings FOR WEEKS AT A TIME.

PLEASE NOTE THE AFORESAID AND ASSIGN ME AN ATTORNEY FROM YOUR DELAWARE OR WASHINGTON. D.C. DIVISION TO HANDLE THESE MATTERS HENCEFORTH. AND I NEED THE CURRENT ADDRESS OF THE FORMER DELAWARE A.C.L.U Dir. JUDITH MULLEN Esq OR WHERE SHE CAN BE REACHED.

I would ask of your position the foregoing ISSUES PRESENT FOR U.S. ATTNy's C.R.I.P.A. VIOLATION/ INVESTIGATION INTO MY ASSAULT.

THANK YOU FOR YOUR ASSISTANCE IN THE AFORESAID.

SINCERELY YOURS,
Shane Hopkins

SHANE K. HOPKINS

XC: FILE

ATTACHMENTS (4)

JUNE 13, 2005

DIRECTOR,
DREWRY NASH FENNEL ESQ. ✓
ACLU OF DELAWARE
100 W. 10th ST.
SUITE 309
WILMINGTON, DE 19801

Re: Submissions To File # 02-22 AND STATUS

DEAR DIRECTOR,

I Submitted AN INCIDENT IN 2002,
ASTO DIANE WINTERS DIRECTION TO DO SO.

I WOULD LIKE TO KNOW THE STATUS OF
MY (CRIPA*) SUBMISSION AND IF YOU ARE GOING TO
REFER THE SUBMISSION TO THE U.S ATTORNEYS OFFICE FOR
INVESTIGATIVE AUTHORITY AFORESAID.

PLEASE ADVISE AND PROVIDE ME WITH A
COPY OF MY SUBMISSION AND ANY RELATIVE LETTERS,
MEMO'S, ECT, DONE AS A RESULT OF THE ASSAULT UPON
MY PERSON.

* 42 U.S.C. § 1997 ET. SEQ.

XC: FILE

CC: MARIE A. O'ROURKE ESQ.
PATRICIA C. HANNIGAN ESQ.
COLM CONNOLLY ESQ.

SINCERELY YOURS,
X Shane Hopkins

SHANE HOPKINS #00253918
1181 Paddock Rd.
SMYRNA DE.
19977-9679

Colm F. Connolly Esq.
UNITED STATES ATTORNEY
1007 ORANGE STREET
STE 700
PO Box 2046
Wilmington DELAWARE 19899-2046

MAY, 20, 2005

RE: 2ND ATTEMPT AND INTERFERENCE OF ACCESS
TO ASSERT A C.R.I.P.A. VIOLATION

DEAR U.S. ATTN Y Connolly:

ON/BEFORE 5-16-05 I
SUBMITTED THE ATTACHED LETTER TO THE LAW
LIBRARIAN, STATE PERSONNEL BRIAN ENGREM FOR COPY
SERVICE. ATTACHED TO IT WAS GRIEVANCE #9907 AND
#9908 AND A 5-5-05 LETTER TO DEPUTY WARDEN
D.E. PIERCE JR. BRIAN ENGREM REFUSED TO COPY
AFORESAID. ON 5-10-05 I RECIEVED ALL MATERIAL BACK
WITH A MEMO SAYING:

"LETTERS TO STAFF AND GRIEVANCES
ARE NOT CONSIDERED LEGAL PHOTOCOPIES."

ON 5-10-05 I RESUBMITTED THE GRIEVANCES
AND LETTER TO BRIAN ENGREM ASKING HIM WHAT POLICY,
PROCEDURE OR CUSTOM HE IS APPLYING IN DENYING ME

CONT.

FROM DOCUMENTING LEGAL ATTACHMENTS TO SUPPORT MY CLAIM TO YOU UNDER C.R.I.P.A. ON 5-13-05 I AGAIN RECEIVED "NO" REPLY AND THE SAME AFORESAID SUBMISSIONS BACK UNCOPIED.

I HAVE THUS INSTITUTED A GRIEVANCE AS TO THE AFORESAID AND I HAVE ADVANCED THE ENCLOSED AFFIDAVIT OUT-LINING THE ENTIRE INCIDENT AND UP TO DATE PATTERN OF RETALIATORY ACTS, GESTURES AND NOW THE AFORESAID ATTEMPT TO ASSERT AND NOTIFY YOUR OFFICE.

I WOULD REQUEST NOW, TO ADDENDUM MY 5-16-05 LETTER TO INCLUDE DENIAL OF ACCESS TO THE COURTS BASED ON MY UNDERLINING C.R.I.P.A. VIOLATIONS AND NOW HINDERING MY ACCESS TO THE COURTS VIA YOUR OFFICE. IN WHICH, I WISH FOR AN INVESTIGATION INTO THE PATTERN OF INCIDENTS DOCUMENTED IN CASE NO. 02-22 WITH THE ACLU OF D.E. SINCE 2002, I DEMAND THAT YOUR OFFICE CONDUCT A C.R.I.P.A. INVESTIGATION AND I AUTHORIZE YOU TO OBTAIN MY AND OTHER INMATES SUBMISSIONS TO D.E. ACLU UNDER CASE NO. 02-22. THE AMOUNT OF SUBMISSIONS CONTAINED THEREIN "WOULD" WARRANT A FEDERAL INVESTIGATION.

CONT.

I would Also Question, Asto FEDERAL CIVIL
R.I.C.O VIOLATIONS ATTACHED TO THESE INCIDENTS BY
PRIVATE AND STATE ENTITIES OVER THE PAST 4. YRS.

UPON NOTIFICATION FROM YOUR OFFICE I WILL
ADVANCE MY GRIEVANCES AND OTHER DOCUMENTATIONS
TO SUPPORT MY CLAIMS AFORESAID.

THANK YOU FOR YOUR PROMPT ATTENTION TO THE
AFORESAID.

Sincerely Yours, .

Shane Hopkins

SHANE HOPKINS #00253918

XC: File

CC: M. JANE BRADY

DREWRY NASH FENNEL ✓

JANET LEBAN D.C.J.S

ATTACHMENTS: (9) PAGE AFFIDAVIT OF CRIPA
VIOLATIONS AND 5-16-05 LETTER

STATE OF DELAWARE
COUNTY OF NEW CASTLE

§§.

AFFIDAVIT/STATEMENT

Shane Hopkins #00253918

STATEMENT

I Shane Hopkins BEING FIRST duly SWORN DEPOSES AND SAYS THAT ON 11-26-04 THE FOREGOING INCIDENT TOOK PLACE IN M.H.U. Bld. # 22 BETWEEN MYSELF AND CORRECTIONAL OFFICERS. I WOULD THEREFORE STATE THE FOLLOWING EVENTS TOOK PLACE AGAINST MY PERSON.

ON 11-26-04 MY CELL MATE BRIAN O'NEAL PURPOSEFULLY CLOGGED OUR CELLS TOILET A-L-#10. BRIAN O'NEAL THEN COMPLAINED TO THE GUARDS ABOUT THE BROKEN TOILET AND DEMANDED TO BE MOVED TO ANOTHER CELL. CORRECTIONAL OFFICER BAKER THEN ORDERED ME TO PACK MY PROPERTY AND MOVE TO CELL A-U-#12. I TOLD C/O BAKER THAT I DID NOT GET ALONG WITH THE INMATE IN CELL A-U-#12 AND THAT I WOULD NOT MOVE BECAUSE WE MIGHT GET INTO A PHYSICAL ALTERCATION. C/O BAKER THEN LEFT THE TIER IN ORDER TO CALL FOR BACKUP.

STATE OF DELAWARE
COUNTY OF NEW CASTLE §§.

CONT PAGE 2 OF 9
AFFIDAVIT STATEMENT

AFTER SEVERAL MINUTES LT. YODER AND C/O^S JOE SMITH AND JOHN PUSEY CAME TO TALK TO ME. I TOLD LT. YODER OF MY FEARS CONCERNING THE MOVE TO CELL A-U-#12.

LT. YODER ASSURED ME THAT THE MOVE WOULD ONLY BE TEMPORARY AND THAT I WOULD BE MOVED BACK TO CELL A-L#10 AS SOON AS THE TOILET WAS FIXED. SO I AGREED TO MOVE.

WHILE I WAS PACKING MY PROPERTY FOR THE MOVE C/O JOE SMITH NOTICED THAT I HAD SEVERAL BOOKS. INSTITUTIONAL POLICY FOR THE M.H.U STATES THAT INMATES ARE ONLY ALLOWED TO HAVE TWO BOOKS. C/O SMITH ORDERD ME TO GO TO CELL A-U-#12 WHILE HE CONDUCTED A INVENTORY SHAKEDOWN OF MY PROPERTY.

DURRING THE INVENTORY / SHAKEDOWN I WAS ABLE TO HEAR AND SEE AS SEVERAL BOOKS ALONG WITH VERIOUS OTHER ITEMS WHERE THROWN INTO THE HALLWAY BY OFFICERS SMITH AND PUSEY.

STATE OF DELAWARE
COUNTY OF NEW CASTLE §§

CONT Page 3 of 9
AFFIDAVIT STATEMENT

AFTER C/O^S SMITH AND POSEY COMPLETED THE INVENTORY / SHAKEDOWN C/O POSEY BROUGHT THE PROPERTY THAT WAS DEEMED ALLOWABLE TO ME IN CELL A-U-#12 IN A TRASH BAG AND ORDERED THE CELL DOOR BE OPENED.

C/O POSEY BEGAN TO HAND ME TWO LIBRARY BOOKS. I STEPPED OUT OF THE CELL AND POINTED DOWN TO MY PERSONAL BOOKS ON THE TIER FLOOR AND ASKED WHY THEY WERE BEING CONFISCATED. C/O POSEY TOLD ME THE BOOKS WERE BEING TAKEN BECAUSE I HAD MORE THEN THE ALLOWABLE NUMBER OF BOOKS.

I TOLD C/O POSEY THAT I WAS ALLOWED TO HAVE TWO INSTITUTIONAL LIBRARY BOOKS ALONG WITH TWO PERSONAL BOOKS.

C/O POSEY TOLD ME THAT HE DID NOT CARE AND HE GRABBED MY SHIRT AND STARTED TO PUSH ME BACKWARDS INTO THE CELL. I TRIPPED OVER THE BAG CONTAINING MY PROPERTY AND HIT MY HEAD ON THE CELL DOOR.

STATE OF DELAWARE
COUNTY OF NEW CASTLE

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CONT PAGE 4 OF 9
AFFIDAVIT STATEMENT

BEFOR I COULD REGAIN MY FOOTING C/O PUSEY
PLACED ME IN A HEADLOCK/CHOKEHOLD AND CALLED
DOWNSTAIRS TO C/O SMITH.

FROM THE HEADLOCK/CHOKEHOLD I ASKED C/O
PUSEY WHAT HIS FUCKING PROBLEM WAS AND REACHED
MY HANDS UP UNDER HIS CHOKING ARM TO RELIEVE THE
PRESSURE FROM AROUND MY NECK.

AT THIS POINT EITHER C/O PUSEY OR C/O
SMITH BEGAN TO PUNCH ME REPEATEDLY IN THE
CHEST AND STOMACH. I COULD NOT SEE WHO
BECAUSE MY HEAD WAS BEING HELD FACING AWAY
FROM THE OFFICERS.

C/O SMITH PULLED MY FEET OUT FROM UNDER
ME AND I FELL TO THE FLOOR. WHERE I VOLUNTARILY
TURNED ONTO MY STOMACH AND PLACED MY HANDS
BEHIND BEHIND MY BACK SO THAT THE C/O'S COULD
PUT THE HANDCUFFS ON.

OFFICER PUSEY KNELT ON MY BACK AS IF
TO CUFF ME.

STATE OF DELAWARE
COUNTY OF NEW CASTLE

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CONT PAGE 5 OF 9
AFFIDAVIT STATEMENT

C/O SMITH BENT OVER ME AND SAID "I HATE THIS FAGGOT MOTHER FUCKER" AND PUNCHED ME REPEATEDLY IN THE FACE.

WHEN I TRIED TO SHIELD MY FACE FROM THIS ATTACK OFFICER POSEY PLACED ME IN A CHOKEHOLD / HEADLOCK AND APPLIED SO MUCH PRESSURE ON MY NECK THAT MY VISION BEGAN TO BLUR AND I BECAME SCARED FOR MY LIFE. I MANAGED TO TELL C/O POSEY THAT I COULDN'T BREATHE. INSTEAD OF LESSENING THE PRESSURE C/O POSEY SQUEEZED HARDER.

I HEARD SOME OTHER OFFICERS ARRIVING BUT I DO NOT KNOW WHO THEY WERE BECAUSE MY HEAD WAS TURNED AWAY FROM THEM. ONE OF THE OFFICERS HOLLERED "SPRAY THIS MOTHER FUCKER" AND I WAS CAPFOAMED AND HANDCUFFED.

I WAS THEN LIFTED TO MY FEET AND TOLD TO FACE THE WALL WHERE C/O SMITH SLAPPED ME IN THE BACK OF THE HEAD REPEATEDLY MAKING MY FACE HIT THE WALL.

STATE OF DELAWARE
COUNTY OF NEW CASTLE §§

CONT PAGE 6 of 9
AFFIDAVIT STATEMENT

I WAS THEN ESCORTED DOWNSTAIRS AND WHEN WE REACHED THE BOTTOM C/O SMITH GRABBED ME BY THE THROAT AND LIFTED MY HEAD UP AS HE LED ME PAST ALL OF THE DOWNSTAIRS CELLS DISPLAYING MY INJURIES TO THE OTHER INMATES.

AFTER WE LEFT THE TIER OFFICER SMITH HELD MY ARMS UP IN THE AIR CAUSING ME TO STOOP FORWARD SO THAT THE TOP OF MY HEAD WAS IN FRONT OF ME. WHEN BUILDING #22 INSIDE SLIDING DOOR OPENED MY ARMS WERE PUSHED SO THAT MY HEAD BANGED INTO THE DOOR JAM.

OFFICERS SMITH AND POSEY BEGAN TO LAUGH AND WHEN BUILDING #22 OUTSIDE SLIDING DOOR OPENED OFFICER SMITH PUSHED MY HANDCUFFED ARMS AND MY HEAD WAS FORCED INTO THE DOOR JAM AGAIN. C/O SMITH SAID "THAT SOUNDED LIKE IT HURT", ALONG WITH VARIOUS OTHER COMMENTS ABOUT THE INCIDENT.

I WAS THEN LED UP THE WALKWAY TO BUILDING #24 WHERE C/O SMITH FORCED MY HEAD INTO THE WALL.

STATE OF DELAWARE
COUNTY OF NEW CASTLE

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CONT PAGE 7 OF 9
AFFIDAVIT STATEMENT

I COULD NOT SEE BECAUSE OF THE CAPFOAM
IN MY EYES AND I WAS UNABLE TO MOVE TO AVOID
THESE BLATANT ATTEMPTS TO INFLICT PAIN.

I WAS THEN TAKEN TO A CLASSROOM AND LEFT ALONE
FOR SEVERAL MINUTES BEFORE NURSE BETTY EXAMINED ME.
I TOLD HER AND EVERYONE ELSE IN THE ROOM HOW C/O^S
SMITH AND PUSEY HAD BEATEN ME WITHOUT JUSTIFICATION.

OFFICER SMITH KEPT SCREAMING FOR ME TO "SHUT
UP HOPKINS", IN ORDER TO PREVENT ME FROM TELLING
OTHER PEOPLE WHAT THEY HAD DONE TO ME.

NURSE BETTY THEN TOLD L.T. TO CLEAN
THE CAPFOAM FROM MY EYES AND I WAS LED FROM THE
CLASSROOM TO A SINK WHERE I HAD MY FACE CLEANED.

I COULD HEAR THAT THERE WERE MANY PEOPLE
AROUND ME SO I BEGAN TO TELL EVERYONE WHAT C/O^S
SMITH AND PUSEY HAD DONE TO ME.

ONCE AGAIN C/O SMITH WAS NEARBY AND HE
ORDERED ME TO "SHUT UP".

STATE OF DELAWARE
COUNTY OF NEW CASTLE

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CONT PAGE 8 OF 9
AFFIDAVIT STATEMENT

AFTER THE CAPFOAM WAS CLEANED FROM MY FACE I WAS TAKEN BACK TO THE CLASSROOM WHERE MY LEGS WERE SHACKLED TO A TABLE.

EVERYONE LEFT THE ROOM AND AFTER SEVERAL MINUTES C/O^S SMITH AND POSEY CAME INTO THE ROOM AND ORDERED ME TO STAND UP. I STOOD UP AND THEY BENT ME OVER A TABLE I WAS SHACKLED TO. C/O SMITH GRABBED MY RIGHT HAND MIDDLE FINGER AND STARTED TO BEND IT BACKWARDS. C/O SMITH THEN LET GO OF MY MIDDLE FINGER AND SWITCHED TO MY INDEX FINGER. C/O POSEY ASKED C/O SMITH IF HE "HAD THE ONE HE WANTED", AND OFFICER SMITH BEGAN TO BEND MY FINGER AS IF TO BREAK IT. WHEN I BEGAN TO FEEL PAIN I CALLED C/O^S SMITH AND POSEY "A COUPLE OF REAL BITCHES" LOUDLY AND THEY BOTH GOT OFF OF ME AND LEFT THE ROOM.

APPROX. 5 MINUTES PASSED AND NURSE BETTY CAME AND CLEANED MY WOUNDS AND CHECKED MY FINGER.

STATE OF DELAWARE
COUNTY OF NEW CASTLE

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CONT PAGE 9 OF 9
AFFIDAVIT STATEMENT

SHE ALSO CHECKED MY BLOOD OXYGEN CONTENT
AND BLOOD PRESSURE BEFORE TELLING ME TO CALM DOWN.

THESE CORRECTIONAL OFFICERS SEEMED TO
DERIVE PLEASURE BY CAUSING ME PAIN.

I DID NOT RESIST THEIR ATTACK AT ANY
TIME BECAUSE I KNEW THE CONSEQUENCES IF
I PUNCHED, KICKED OR SCRATCHED THESE GUARDS.

BECAUSE OF THE EXTENSIVE INJURIES I
RECEIVED I REQUESTED PICTURES BE TAKEN OF
MY BODY. L.T. TOOK SEVERAL PHOTOS BUT
HE COULD NOT TAKE PICTURES OF THE BUMPS AND
ABRAISIONS ON MY SCALP.

I DID NOT RESIST THESE OFFICERS ENOUGH
TO JUSTIFY MY INJURIES.

NO OFFICERS RECEIVED ANY INJURIES
DURING THIS ALTERCATION.

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 20th day OF
MAY 2005

Shawn Hopkin

Brian D. Ingram
NOTARY PUBLIC

TO: Colm F. Connolly Esq.

5-16-05

U.S. Attorney
1007 Orange Tree St.
P.O. Box 2046
Wilmington Delaware
19899-2046

Re: Request For Criminal C.R.I.P.A Investigation
And 5 USC § 552 F.O.I.A *

Dear Counsel:

Attached herein is an incident that I am requesting your office conduct an investigation of under C.R.I.P.A. U.S.C. § 1997 provisions, in that the incident is an on-going pattern of conduct that is related to File #02-22 of the Delaware A.C.L.U based on the same illegal conduct of State officials upon inmates. I would request that Criminal Charges be instituted henceforth.

I would also request under ^{*}Freedom Of Information Act that you disclose the number of Assault Cases your department has investigated in the past 5 years. This would be a request for the names of victims and Correctional officers involved.

CC: Attorney General

Sincerely Yours

Jane M. Brady

A.F.U. D.N.F. WELLES

X
Shane Hopkins #00253918

xc: File Attachments